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6 *Attorneys for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF ARIZONA**

9 Kashane Kirk, as Personal Representative
10 and on behalf of the Estate of Leontae
Kirk; Sharon Roberts, individually;
11 Brittnie Turner, on behalf of and as legal
guardian and parent of her minor child,
12 MC,

13 Plaintiffs,

14 vs.

15 City of Phoenix, a governmental entity;
Michael Sullivan, Chief of the Phoenix
16 Police Department; Autumn Ladines and
John Doe Ladines, husband and wife;
Officer Antonio Garza and Jane Doe
17 Garza, husband and wife; Sergeant Eric
Roy and Jane Doe Roy, husband and wife;
Officer Makic and Jane Doe Makic,
husband and wife; Jaclyn Ravelo and John
18 Doe Ravelo, husband and wife; Steven
Ramirez and Jane Doe Ramirez, husband
19 and wife; Jonathan Howard and Jane Doe
Howard, husband and wife; Officer
20 Morgan Traylor and Jane Doe Traylor,
husband and wife; Officer Reddy and Jane
Doe Reddy, husband and wife; and,
Humberto Gonzalez-Rios and Jane Doe
21 Gonzalez-Rios, husband and wife,

22 Defendants.

23 Case No.: CV-23-00836-PHX-MTL
(CDB)

24 **PLAINTIFFS' MOTION TO EXTEND
ANSWER DEADLINE**

25 (Assigned to the Honorable Michael T.
Liburdi and referred to the Honorable
Camille D. Bibles)

1 Through counsel undersigned, Plaintiffs hereby respectfully request and move that
2 the deadline for Defendants to file an answer, or otherwise respond, to the Complaint
3 (currently October 20, 2023), be extended until up to and including November 3, 2023.
4
5 The parties have engaged in discussions that could help focus this lawsuit in terms of
6 parties and claims. Specifically, on October 17, 2023, the parties held a meet and confer
7 regarding potential issues with the Complaint and Plaintiffs' claims as pled therein.
8 Plaintiffs' counsel agreed to file an amended complaint that would address those issues and
9 hopefully obviate the need for Defendants to file their planned motion to dismiss.
10 Plaintiffs' counsel endeavored to file that amendment by today's answer deadline.
11 However, he has unfortunately been out of the office this week for personal reasons, and
12 thus was unable to file the amended complaint by today's deadline. Plaintiffs' counsel will
13 return to the office next week, and the amended complaint will be filed no later than
14 October 25, 2023. Now that Plaintiffs have voluntarily dismissed the Gonzalez-Rios,
15 Reddy, Traylor, and Makic Defendants, all parties have been served, and there is no
16 prejudice to the remaining Defendants because, as set forth above, counsel have discussed
17 and agreed that an amended complaint will help streamline this matter and hopefully
18 obviate the need for a motion to dismiss.

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RESPECTFULLY SUBMITTED this 20th day of October 2023.

MILLS + WOODS LAW, PLLC

By /s/ Sean A. Woods

Robert T. Mills
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Phoenix, AZ 85014
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2023, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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Attorney for Defendants City of Phoenix, Sullivan, Ladines, Garza, Roy, Makic, Ravelo, Ramirez, Howard, Traylor, and Reddy

/s/ Ben Dangerfield